July 29, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket Nos. 11-90 and 10-28; FCC 11-79
Proposed Modifications to FCC Rules to Allow Operation of Radar Systems in the 76-77 GHz Band

Dear Ms. Dortch:

The Technical Affairs Committee of the Association of Global Automakers[1] supports the June 16, 2011, proposal of the Federal Communication Commission (FCC) to amend its Part 15, Radio Frequency Devices, rules to facilitate the use of radar-based collision avoidance technologies for motor vehicles. The FCC proposal would eliminate the existing requirement that vehicular radars decrease power when the vehicle on which the radar is mounted is not in motion. We also reiterate our September 25, 2009, Statement of support for the Toyota petition that led to the initiation of this proceeding (our Statement was filed under the Association's previous name, the "Association of International Automobile Manufacturers").

In pursuing this rulemaking, we urge the Commission to implement regulatory criteria that facilitate the introduction of new crash avoidance technologies, while protecting against harmful human exposure to RF radiation and avoiding signal interference. We also urge the Commission to harmonize its rules governing the vehicular radar emissions to the extent practicable with those set forth outside the United States. Such harmonization would benefit the automotive industry in terms of new product development and cost reduction. The proposed limits, 88 µW/cm2 (average) and 279 µW/cm2 (peak), are almost equivalent to the ones specified in international regulations. In order to achieve further harmonization, we urge the Commission to change the units expressing the emissions limits in the FCC regulation from "µW/cm2" to "dBm". The mathematically equivalent values would be 50 and 55 for the average and peak levels, respectively.

We appreciate the efforts of the Commission to facilitate the introduction of new vehicle safety technologies. We anticipate that these technologies will provide a major step forward in avoiding vehicle crashes and thereby saving lives and preventing/mitigating injuries.

[1] *The Association of Global Automakers, formerly known as the Association of International Automobile Manufacturers (AIAM), represents international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Our Technical Affairs Committee members include: American Honda Motor Co., American Suzuki Motor Corp., Aston Martin Lagonda of North America, Inc., Ferrari North America, Inc., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Inc., Mahindra & Mahindra Ltd., Maserati North America, Inc., McLaren Automotive Ltd., Nissan North America, Inc. Peugeot Motors of America Subaru of America, Inc., ADVICS North America, Inc., Delphi Corporation, Denso International America, Inc., and Robert Bosch Corporation. We work with industry leaders, legislators, and regulators in the United States to create public policies that improve motor vehicle safety, encourage technological innovation, and protect our planet. Our goal is to foster an open and competitive automotive marketplace that encourages investment, job growth, and development of vehicles that can enhance Americans' quality of life. For more information, visit www.globalautomakers.org.*

GlobalAutomakers

Global Automakers appreciates the Commission's consideration of our comments. Should you have any questions on this matter, please contact me at 202-650-5561.

Sincerely,

Michael X. Cammisa
Director, Safety

cc: Aamer Zain, Office of Engineering and Technology